

IN THE  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FILED

2002 JUL 12 PM 2:53

U.S. DISTRICT COURT

KHALIL ABDUR RAHIM, )  
Representative of the Estate )  
of GREGORY MAY, )  
MICHAEL DATES, )  
and WARDELL KYLES )  
Plaintiff, )

vs. )

No. 99 C 0395

MICHAEL F. SHEAHAN, Sheriff of )  
Cook County, RICHARD REMUS, )  
Superintendent for External )  
Operations, Cook County Department )  
of Corrections, ERNESTO VELASCO, )  
Director, Cook County Department )  
of Corrections, )  
Defendants. )

Honorable Sidney Schenkier

DOCKETED

JUL 24 2002

PLAINTIFFS' MOTION TO MODIFY  
PUBLICATION OF CLASS NOTICE

The Plaintiffs, through their attorneys, THOMAS PETERS, KEVIN PETERS and GIL SAPIR, request this Honorable Court to modify the class publication requirements. In support thereof, they state as follows:

1. The parties reached a settlement that called for publication in the Defender, LaRaza, Chicago Sun Times, and Reader newspapers.

2. Notice of the proposed settlement also was to be published in every division of the Cook County Jail and in the

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lockup areas of the Cook County courts.

3. In addition, notice was mailed to the last known address of all class members.

4. All the required forms of notice have been published, with one exception.

5. Plaintiffs have not published the notice in the Chicago Sun Times.

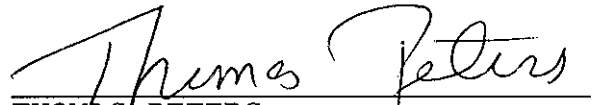
6. The cost of publication in the classified section of the Sun Times for three work days is approximately \$8,000 dollars.

7. For the same cost, Plaintiffs can publish three times each in the Defender, LaRaza, and the Reader.

8. Furthermore, Plaintiffs can for the same cost have notices in the Defender, LaRaza and the Reader that are more than three times larger than notice in the Sun Times.

WHEREFORE, Plaintiffs pray this Court will modify the class notice requirement and allow Plaintiffs to re-publish in the Reader, LaRaza and the Defender rather than publishing in the Chicago Sun Times.

Respectfully submitted,

A handwritten signature in cursive script that reads "Thomas Peters". The signature is written in dark ink and is positioned above a horizontal line.

THOMAS PETERS

KEVIN PETERS

GIL SAPIR

542 S. Dearborn, Suite 750

Chicago, IL 60605

312-697-0022

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NOTICE OF MOTION

TO: Mr. Thomas M. Burnham  
Michael Jacobs  
Assistant State's Attorney  
Richard J. Daley Center  
Chicago, IL 60602

DOCKETED

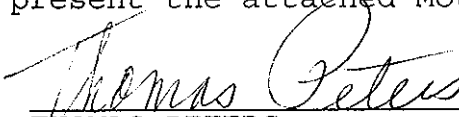
JUL 24 2002

PLEASE TAKE NOTICE that on July 12, 2002, I filed with the Clerk of the United States District Court for the Northern District of Illinois, **PLAINTIFFS' MOTION TO MODIFY PUBLICATION OF CLASS NOTICE**, copies of which are attached.

PLEASE ALSO TAKE NOTICE that on July <sup>23</sup>~~17~~, 2002, at 8:30 A.M., I shall appear before Judge Sidney Schenkier in Room 1700, in the



United States District Court for the Northern District of  
Illinois, and then and there present the attached Motion.

  
\_\_\_\_\_  
THOMAS PETERS

KEVIN PETERS

GIL SAPIR

542 S. Dearborn, Suite 750

Chicago, Illinois 60605

(312) 697-0022

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby swear that I served the above  
Notice and attached Motion by hand delivering copies to each of  
the above named parties, at the addresses indicated above, before  
5:00 p.m. on July 12, 2002.

  
\_\_\_\_\_

SUBSCRIBED AND SWORN TO  
before me this 12<sup>th</sup> day  
of July, 2002.

  
\_\_\_\_\_  
NOTARY PUBLIC

